RECEIVED FEDERAL ELECTION COMMISSION WAIL ROOM

July 31, 1997

Mr. Scott Francis
Reports Analyst
Reports Analysis Division
Federal Election Commission
Washington, DC 20463

Aug 4 9 18 M '97

Dear Scott:

Please accept this letter and the accompanying attachments as Commerce Bancorp, Inc. Political Action Committee, Fed's response to your request for additional information in your letters dated July 2, 1997. The letters covered the October Quarterly Report (7/1/96 - 9/30/96) and the 30 Day Post-General Report (10/1/96 - 11/25/96) previously filed by that committee.

As indicated in the attached letters, we have requested refunds of the amounts in excess of \$1,000. The refunds will be disclosed on Schedule A supporting Line 16 of the report covering the period during which the refunds are received.

Thank you for your assistance in this matter.

Very truly yours.

Douglas & Pauls

Assistant Treasurer, Commerce Bancorp, Inc.

Political Action Committee, FED

000303156

ec:

C. Edward Jordan, Jr.

Inth M 2004 31

Friends of Jim Saxton Box 795 Mt. Holly, NJ 08060

Attn: Ms. Patricia Walker, Treasurer

Dear Pat:

It has recently been brought to our attention that Commerce Bancorp, Inc. Political Action Committee Fed ("Compac Fed") does not yet qualify as a multi-candidate political committee under the Federal Election Commission guidelines. As such, Compac Fed is precluded from making contributions to candidates for federal office in excess of \$1,000 per election. On July 16, 1996, Compac Fed contributed \$5,000 to Friends of Jim Saxton. Given that Compac Fed did not qualify as a multi-candidate committee at that time, we must request a refund of \$4,000 of the July 16, 1996 contribution.

A copy of correspondence received from the Federal Election Commission is enclosed for your records. If you have any questions, I can be reached at (609)751-2727. The refund can be sent to my attention at the address below. Thank you for your help in resolving this matter.

Very truly yours

Douglas J. Pauls

Assistant Treasurer, Commerce Bancorp, Inc.

Political Action Committee, Fed

Commerce Bancorp, Inc.

1701 Route 70 East

Cherry Hill, NJ 08034

ee: C. Edward Jordan, Jr.



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-2

JUL - 2 1997

C. Edward Jordan Jr., Treasurer Commerce Bancorp, Inc. Political Action Committee Fed 1701 Route 70 East Cherry Hill, NJ 08034

Identification Number: C00303156

Reference: October Quarterly Report (7/1/96-9/30/96)

Dear Mr. Jordan:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule B of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. 2 U.S.C. §441a(a) precludes a political committee, other than a multi-candidate committee, from making a contribution to a candidate for federal office in excess of \$1,000 per election. Please refer to the Campaign Guide for information on how a committee qualifies for multicandidate status.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If you have made an excessive contribution, you should notify the recipient and request a refund of the amount in excess of \$1,000 and/or notify the recipient in writing of your redesignation of the contribution. In the best interest of your committee, all refunds and redesignations should be made within sixty days of the treasurer's receipt of the contribution(s).

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund request sent to the candidate(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo entries on

Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. 11 CFR §110.1(b)

Although the Commission may take further legal action regarding the excessive contribution(s), your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

-For fature filings, please note that your committee need only file the pages on which you have itemized activity. Schedules with no activity may be omitted.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,

Scott Francis

Reports Analyst

Reports Analysis Division

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,HEDULE 8

ITEMIZED DISBURSEMENTS

Use expanse schedule(s) for each category of the Detailed Summing Page

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Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of cofficiting contributions or for commercial purposes, other than using the name and address of any political committee to solicit considerious large such committee.

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Frank LoBiondo for Congress c/o Andrew J. McCrosson, Treasurer PO Box 775 Marmora, NJ 08223

Dear Drew:

It has recently been brought to our attention that Commerce Bancorp, Inc. Political Action Committee Fed ("Compac Fed") does not yet qualify as a multi-candidate political committee under the Federal Election Commission guidelines. As such, Compac Fed is precluded from making contributions to candidates for federal office in excess of \$1,000 per election. On October 23, 1996, Compac Fed contributed \$2,000 to Frank LoBiondo for Congress. Given that Compac Fed did not qualify as a multi-candidate committee at that time, we must request a refund of \$1,000 of the October 23, 1996 contribution.

A copy of correspondence received from the Federal Election Commission is enclosed for your records. If you have any questions, I can be reached at (609)751-2727. The refund can be sent to my attention at the address below. Thank you for your help in resolving this matter.

Very truly yours,

Dougles J. Pauls

Assistant Treasurer, Commerce Bancorp, Inc.

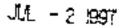
Political Action Committee, Fed

Commerce Bancorp, Inc.

1701 Route 70 East

Cherry Hill, NJ 08034

C. Edward Jordan, Jr.



C. Edward Jordan Jr., Treasurer
Commerce Bancorp, Inc. Political
Action Committee Fed
1701 Route 70 East
Cherry Hill, NJ 08034

Identification Number: C00303156

Reference: 30 Day Post-General Report (10/1/96-11/25/96)

Dear Mr. Jordan:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule B of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. 2 U.S.C. §441a(a) precludes a political committee, other than a multi-candidate committee, from making a contribution to a candidate for federal office in excess of \$1,000 per election. Please refer to the Campaign Guide for information on how a committee qualifies for multicandidate status.

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ij.

Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. 11 CFR §110.1(b)

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A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,

Scott Francis

Reports Analyst

Reports Analysis Division

268

SCHEDULE B

ITEMIZED DISSURSEMENTS

Use separate sthedule(s) PAGE OF to wach category of the Doctored Supposery Page FOR UNE NUMBER

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial curposes, other than using the name and address of any political contributes to selectionalizations from such committee. NAME OF COMMITTEE (In Full) Compac-Fed Appending of Earth Date (month. Purposa of Distrependent A. Yug plame, Mailing Address and ZP Code Diaburgament This Period إجعلا أأحي RJ - 2nd district Frank Lobioudo for Compress \$2,000.00 10/23/96 5914 Main Street, Swite 103 Primary | X Genaral Discussioned the Mays Landing, MJ 08330 Cities (specify) Amount of Each Date (month) Purpose of Citizenson Park B. Full Name, Mailing Address and ZIP Code CON. YOU? Distructional Tree Parket. Primary General Classification and loc Citizan (special) Amount of Each Claim (mandh, Реграмм от Орбилавлога C. Full Name, Milling Address and ZIF Code Distructions (70th Pariod dey, year) -17 Controversed for: Primary Congression). Amount of Each Date (projekt). Pumping of Tithorasy with D. Full Name, Helling Address and ZIP Gate Chickwarper's This Period day, year) Primary Citabura granti for: Cities (Spinstry) ARRESTS OF CROSS Daire (decirit), Purpose of Claburacounts E. Poli Herne, Meding Address and ZP Code Desputation This Pariod day, year) University for Primary General Other (apecity) Amount of Each Date (month. Personal of Chairman Chairm Chibuseament, This Penor F. Full Name, Mailing Address and 22 Cabo (SERT (SERT) Claims with the Princer General Committee (second) Account of Each Date (MORES, Purpose of Disturbentant Distributed This Ports G. Pull Happe, Valling Address and ZP Gods الكسر روية Distriction Friends | General COLUMN (MOREON) AMOUNT OF EACH Carro (carron, Purpose of Clabura servera H. Full Harris, Helling Address ont 33° Code Chinasternard Title Print day, year) Printing General Other (specially) Amount of Each Case (month) Personal of Clabumacraes. <u>विकास सम्बद्धाः स्थापः ।</u> I, Full Hemo, Neifing Address and IP Code CONT. YOUR T Distance in ter Principly COMM. [EDGGS] SUBTOTAL of Cighterpenants (this Pages (opinions)) <u> ГГ; И</u> \$2,000.00 TOTAL This Period (last page this line display only) . . FERMINE.

Federal Election Commission

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ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS The Commission has added this page to the end of this filing to indicate how it was received. DATE OF RECEIPT Hand Delivered First Class Mail POSTMARKED Registered/Certified Mail No Postmark Postmark Illegible DATE OF RECEIPT Received from the House Office of Records and Registration DATE OF RECEIPT Received from the Senate Office of Public Records POSTMARKED Other (Specify): and/or DATE OF RECEIPT